

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
FCC Seeks Comment on Report on Process Reform	)	GN Docket No. 14-25
	)	
	)	

**To: The Commission**

**COMMENTS OF THE SMALL COMPANY COALITION**

The Small Company Coalition (SCC), a national group of rural telecommunications and broadband providers, would like to thank the FCC for undertaking such process reforms as indicated by the Report and Public Notice released on February 14, 2014.<sup>1</sup> The SCC has come before the Commission on numerous occasions, primarily in regard to Universal Service reform and regulatory compliance concerns.

We appreciate this opportunity to express our views on how the FCC can “operate in the most effective, efficient and transparent way possible.”<sup>2</sup> We are also encouraged by the initiative taken by the FCC to examine its internal operations “with the aim of improving the overall functioning of the agency and its service to the public.”<sup>3</sup>

While the SCC has been encouraged by the dialogue held to date with the Commission, various procedural hiccups at times have resulted in a lack of clarity regarding the FCC’s positions in these matters. In other instances, ambiguity concerning deadlines for the Commission’s responses has left various rural companies in limbo. The “shot-clock”

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<sup>1</sup> *FCC Seeks Public Comment on Report on FCC Process Reform*, DA 14-199, Public Notice and Report, released February 14, 2014.

<sup>2</sup> *Id.* at p. 1.

<sup>3</sup> *Id.*

implemented in the USF/ICC Transformation Order's waiver process may be one of the more emblematic cases in which the Commission's decision-making timelines have been difficult to gauge. While the "shot-clock" itself is a useful device for tribal companies, the lack of transparency as to when it may be "reset" has caused concern regarding its predictability. .

The SCC would like to commend the Commission for its stated goal to "[examine] the FCC's data collection practices to lessen burdens where possible, while ensuring the agency's data collection practices are effectively tailored to evolving market conditions."<sup>4</sup> The companies of the SCC have a significant interest in this endeavor, and have compiled a chart detailing hours spent in compliance with federal regulations. A copy of this information is attached hereto, and the SCC urges the Commission to review this data in light of the February 2014 Report and Public Notice.

The data compiled by the SCC demonstrates that a typical rural broadband provider spends an average of over 860 hours annually in order to comply with 70 federal regulations. Naturally, this does not include any hours spent on state or local regulatory compliance. The SCC suggests that the Commission pursue prudent reductions to these requirements which shall benefit small companies struggling to meet them. Additionally, the elimination of such superfluous and/or onerous data requests shall directly assist in meeting the FCC's goal of reducing its backlogs.

Finally, the SCC applauds the Commission's intent to "[enhance] the FCC's public outreach and transparency, [and explore] innovative mechanisms for developing policy proposals."<sup>5</sup> In representing external stakeholders before the FCC and the Wireline Competition Bureau, the SCC has offered various policy proposals to the Commission, most notably of which

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<sup>4</sup> *Public Notice* at pp. 1-2.

<sup>5</sup> *Public Notice* at p. 2.

being an alternative model to the Quantile Regression Analysis (QRA), which was filed on record with the Commission.<sup>6</sup>

While the discussions pertaining to these proposals were productive, follow-up has invariably proven to be less efficient. Similar to the previously-mentioned concerns regarding transparency, it has been the SCC's experience that proposals may enter a policy-purgatory of sorts, neither being adopted nor constructively criticized for feedback or even outright rejected. Consequently, it may be difficult for such parties to pursue appropriate action following these meetings and filings.

Thank you for your consideration.

Respectfully submitted,

**Small Company Coalition  
Executive Committee**

By: /s/ James J. Kail  
James J. Kail, Executive Committee

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<sup>6</sup> *Small Company Coalition and Alexicon Telecommunications Consulting Notice of Ex Parte*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45; filed September 20, 2012.

Federal Regulatory Compliance Calendar  
2013

Due	Burden (Hrs)	Note	Filing Requirement Description
Annually	1.0		FORM 473 Universal Service for Schools & Libraries Service Provider Annual Certification Form
Annually	5.0		Do Not Call Notification for Telecommunications Carriers
Variable due date 120 days after the last date service is received or 120 days after date of the form 486 notification letter whichever is later	1.5		FCC Form 474 Universal Service for Schools and Libraries Service Provider Invoice Form
N/A	2.0		CALEA Manuals
N/A	1.5		FCC 498 SPIN and Contact Info Form
1/8/2013	2.5		FCC Form 497 – Low Income Monthly Reporting (December)
1/15/2013	2.5		HAC Handset Reporting Deadline - FCC Form 655
1/31/2013	3.0		COCOT Reporting (Fourth Quarter)
1/31/2013	15.0		FCC Form 555 – Annual Lifeline ETC Certification Form
1/31/2013	2.0		Carrier Identification Code Report
1/31/2013	44.4		FCC Form 502 – Numbering Resource Utilization/Forecast (July 1st – December 31st of previous year)
2/1/2013	10.0		FCC Form 499Q – Telecommunications Reporting Worksheet (4th Quarter of previous year)
2/8/2013	2.5		FCC Form 497 – Low Income Monthly Reporting (January)
2/10/2013	2.0		Mandatory Access Line Forecast data collection for September access lines
2/11/2013	85.0		Interstate Revenue Projections (NECA TRP Submission) (current year and subsequent two years)
2/20/2013	24.0		NECA - Company Services Questionnaire
3/1/2013	65.0		FCC Form 477 – Local Competition and Broadband Reporting
3/1/2013	15.0		CPNI Certification



Federal Regulatory Compliance Calendar  
2013

Due	Burden (Hrs)	Note	Filing Requirement Description
3/8/2013	2.5		FCC Form 497 – Low Income Monthly Reporting (February)
5/23/2013 Annually on 3/15	24.0		File initial study area boundary data (maps) - pending due date notice from FCC File updates (if necessary) to mapping data annually on March 15 If data does not change, certify accuracy every two years (anticipate the first such filing in 2015)
3/8/13 to NECA 3/29/13 to USAC	5.3		FCC Form 507/Cat 1.3 Loops – ICLS Mechanism Line Count Form (as of 9/30 of prior year)
3/22/2013	24.0		ICC / CAF Data Collection  This is phase 1 of the annual data request to be filed with NECA as part of the annual access tariff filing and also to calculate ARC and CAF ICC. NECA will review and make corrections if needed. Corrected data, if any, will need to be certified by May 28.
3/25/2013	1.6		FCC Form 508 – Projected Common Line Reporting
3/29/2013	2.0		FCC Form 492 - Annual Rate of Return Carrier Report
3/29/2013	0.5		FCC Form 525 - Competitive Carrier High Cost Data Submission
4/1/2013	5.0	Pending possible permanent exemption for small ISPs	Annual Accessibility Certification (14.31(b)(1))
4/1/2013	13.5		FCC Form 499A – Telecommunications Reporting Worksheet (Annual reporting for previous calendar year)
4/1/2013	2.0		Annual International Circuit Status Report
4/1/2013	20.0		Optional NECA Advance Services Data Request
4/8/2013	2.5		FCC Form 497 – Low Income Monthly Reporting (March)
4/30/2013	3.0		COCOT Reporting (First Quarter)
5/1/2013	10.0		FCC Form 499Q – Telecommunications Reporting Worksheet (1st Quarter)
5/1/2013	1.0		IXC Detariff Annual Certification/Geographic Rate Averaging (\$64,1900 of FCC Rules)
5/8/2013	2.5		FCC Form 497 – Low Income Monthly Reporting (April)



Federal Regulatory Compliance Calendar  
2013

Due	Burden (Hrs)	Note	Filing Requirement Description
5/28/2013	44.0		<b>FCC 2012 CAF ICC Final View and Certification</b> – NECA will re-open the CAF ICC data submitted in the preliminary filing with possible changes to the original submission based on NECA's test period 2012/2013. You will need to make any corrections by May 23 and submit final view along with the electronic certification. This is optional for Non-TS pool members.
5/31/2013	1.0		<b>FCC Form 395 – Common Carrier Annual Employment Report &amp; Discrimination</b>
6/17/2013	5.0	Pending revision from the FCC - should be due with annual tariff, TRP, or CAF ICC filings (i.e., June)	<b>54.304(d)(1)</b> File projected CAF ICC during upcoming funding period (July 1, 2013 - June 30, 2014). Filing made with FCC, USAC, state commission/Tribal entity.
6/17/2013	5.0	Pending revision from the FCC - should be due with annual tariff, TRP, or CAF ICC filings (i.e., June)	<b>51.917(f)(3) - Certify Compliance with 51.917(d)&amp;(e)</b> This filing is to certify that the calculation of the CAF ICC support was done in accordance with 51.917(d) & (e).
6/7/2013	2.5		<b>FCC Form 497 – Low Income Monthly Reporting (May)</b>
6/17/2013 (pending TRP notice from FCC)	2.0	Filed with annual tariff/TRP filings	<b>Accuracy Certification</b> All carriers must file a certification regarding the accuracy of the tariff filing and TRP supporting materials
6/17/2013 (pending TRP notice from FCC)	2.0	Filed with annual tariff/TRP filings	<b>51.917(d)(vii) - Duplicative Recovery Certification</b> - Certification to be filed with annual tariff filings (filed with FCC and state commission). - Applies to carriers charging the ARC (and/or receiving CAF ICC support) - Carrier to certify it is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the FCC's recovery mechanism
6/17/2013 (pending FCC approval)	34.0	Filed with annual tariff/TRP filings	<b>51.919(b) - ICC Reform Compliance and Monitoring Form</b> CAF ICC recipients are to report annually data regarding ICC rates, revenues, expenses, and demand <i>Proposed form issued in 1/4/2013 Public Notice. Awaiting adoption of form, but reporting for 2011 data is likely at some point in 2013.</i>
6/28/2013	2.0		<b>ICLS Use Certification (FCC &amp; USAC)</b>
TBD	60.0		<b>Annual ETC Reporting and Form 481</b> Various reporting requirements per 54.313.
7/8/2013	2.5		<b>FCC Form 497 – Low Income Monthly Reporting (June)</b>
7/8/2013 to NECA	5.3		<b>FCC Form 507 – ICLS Mechanism Line Count Form (as of 12/31 of previous year) &amp; NECA 1.3 Loop Data Request</b>
7/31/2013	3.0		<b>COCOT Reporting (Second Quarter)</b>



Federal Regulatory Compliance Calendar  
2013

Due	Burden (Hrs)	Note	Filing Requirement Description
7/31/2013	0.5		FCC Form 525 - Competitive Carrier High Cost Data Submission
7/31/2013	25.5		USF 13-1 (YE 12/31) – High Loop Cost Data Collection (USAC) (January 1– December 31)
7/31/2013	35.0		Interstate Toll Separations Study (NECA) (January – December of prior year)
7/31/2013	5.0		International Traffic Report
7/31/2013	5.0		Carrier Identification Code Report
8/1/2013	44.4		FCC Form 502 – Numbering Resource Utilization/Forecast (January 1st – June 30th of current year)
8/1/2013	10.0		FCC Form 499Q – Telecommunications Reporting Worksheet (2nd Quarter)
August - Date to be announced	2.0		FCC Reg Fee Election
8/8/2013	2.5		FCC Form 497 – Low Income Monthly Reporting (July)
8/30/2013	65.0		FCC Form 477 – Local Competition and Broadband Reporting
9/6/2013	2.5		FCC Form 497 – Low Income Monthly Reporting (August)
9/9/13 to NECA. To USAC 9/26/13	5.3		FCC Form 507 – ICLS Mechanism Line Count Form - 1.3 Loop Data No Longer Required
9/30/2013	0.5		FCC Form 525 - Competitive Carrier High Cost Data Submission
10/1/2013	24.0		Universal Support Use Certification (§ 54.314(d))
10/8/2013	2.5		FCC Form 497 – Low Income Monthly Reporting (September)
10/31/2013	3.0		COCOT Reporting (Third Quarter)
11/1/2013	10.0		FCC Form 499Q – Telecommunications Reporting Worksheet (3rd Quarter)
11/8/2013	2.5		FCC Form 497 – Low Income Monthly Reporting (October)
12/6/2013	2.5		FCC Form 497 – Low Income Monthly Reporting (November)
12/6/13 to NECA.	5.3		FCC Form 507 – ICLS Mechanism Line Count Form - 1.3 Loop Data No Longer Required

# Federal Regulatory Compliance Calendar

2013

Due	Burden (Hrs)	Note	Filing Requirement Description
12/10/2013 - Estimated	2.7		FCC Form 509 - Actual Common Line Reporting
12/30/2013	0.5		FCC Form 525 - Competitive Carrier High Cost Data Submission
12/31/2013	35.0		Lifeline Customer Recertification (54.405(e)(4))
Recertification process for 2013 must be complete, results to be reported on Form 555 by January 31 of the following year			

Total Hours 862.8  
Federal Filings 70

	Filings in yellow do not have specific burden estimates published by the FCC and represent an estimate based either on our actual experience in dealing with the filing or analysis of the rules
	Filings with no color depict the burden estimate published by the FCC
	Filings in blue represent new filings due in 2013 as a result of the FCC reform orders

NOTE: THIS CALENDAR IS A GENERAL GUIDELINE ONLY AND MAY NOT INCLUDE EVERY REGULATORY DEADLINE. DUE DATES MAY CHANGE AND FILINGS MAY BE ADDED OR REMOVED THROUGHOUT THE YEAR. FILINGS LISTED MIGHT NOT APPLY TO ALL CARRIERS. THIS CALENDAR DOES NOT INCLUDE STATE FILING REQUIREMENTS